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Trustee for the Substantively Consolidated SIPA

Liquidation of Bernard L. Madoff Investment

Securities LLC and the estate of Bernard L. Madoff

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SONJA KOHN, et al.,

Defendants.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-05411 (SMB)

STIPULATION AND ORDER EXTENDING TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, and defendants Sonja Kohn, Infovaleur, Inc. and Tecno Development & Research, Ltd. (the “Defendants”), by their undersigned counsel, that the time by which the Defendants may respond to the Motion for Leave to File a Third Amended Complaint (the “Motion to Amend”) filed by the Trustee is extended up to and including September 1, 2016. It is further stipulated and agreed that the Trustee shall file his reply on or before September 22, 2016. The return date for this matter is set for October 26, 2016 at 10:00 a.m.

The purpose of this stipulated extension (the “Stipulation”) is to provide additional time for the Defendants to respond to the Motion to Amend. The extension of time granted by this Stipulation is without prejudice to any future extensions of time.

Undersigned counsel for the Defendants represent that service of process of the summons and Complaint on the Defendants has been completed, and hereby waives any defenses based on insufficiency of process or insufficiency of service of process on behalf of the Defendants.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: June 16, 2016
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Keith R. Murphy

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Liquidation of Bernard L. Madoff
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of Bernard L. Madoff*

**NEUBERGER, QUINN, GIELEN, RUBIN & GIBBER,
P.A.**

By: /s/ Nathan D. Adler

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*Attorneys for Defendants Sonja Kohn,
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Research Ltd.*

SO ORDERED this 17th day of June, 2016.

/s/ STUART M. BERNSTEIN

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE